

WILLIAM W. McGAHA, ESQ.

Nevada Bar #3234

SCHUETZE, McGAHA, TURNER & FERRIS PLLC

601 S. Rancho Drive, Suite C-20

Las Vegas, Nevada 89106

(702) 369-3225 Telephone

(702) 369-2110 Fax

bmcgaha@smlvlaw.net

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

D. ANTHONY WASHINGTON,

Plaintiff,

vs.

PEDRO VALLADARES HIDALGO and
PBRB LOGISTICS, LLC; DOES I – X, and
ROE CORPORATIONS XI – XX, inclusive,

Defendants.

CASE NO: 2:22-CV-01545-JCM-DJA

**STIPULATION AND ORDER TO
EXTEND REBUTTAL EXPERT
DISCLOSURE AND DISCOVERY
DEADLINES (SECOND REQUEST)**

IT IS HEREBY STIPULATED, by and between the parties through their undersigned counsel of record, WILLIAM W. McGAHA, ESQ., of SCHUETZE, McGAHA, TURNER & FERRIS, PLLC, counsel for Plaintiff, and STEVEN BROKA, ESQ., of WINNER & BOOZE, counsel for Defendants, as follows:

The parties stipulated and respectfully request that this Honorable Court extend the rebuttal expert disclosure deadline and related all deadlines arising therefrom, found in their Discovery Plan and Scheduling Order, originally filed September 29, 2022, in this matter as set forth below:

A. Discovery Cut-Off:

a. Current Deadline: August 14, 2023

b. New Deadline: September 13, 2023

///

///

B. Initial Expert Disclosures & Reports:

- a. Current Deadline: Closed
- b. New Deadline: Closed

C. Rebuttal Expert Disclosures & Reports:

- a. Current Deadline: July 17, 2023
- b. New Deadline: August 16, 2023

D. Motion to Amend Pleadings & Add Parties:

- a. Current Deadline: Closed
- b. New Deadline: Closed

E. Interim Status Report:

- a. Current Deadline: None
- b. New Deadline: N/A

F. Dispositive Motions:

- a. Current Deadline: September 12, 2023
- b. New Deadline: October 12, 2023

G. Pre-Trial Order:

- a. Current Deadline: October 11, 2023
- b. New Deadline: November 10, 2023

The parties to this action are not making this request for the purpose of unduly delaying the trial in this matter. The parties are diligently working together to complete discovery. While initial expert reports were produced, rebuttal experts and reports will require more than 30 days and therefore the need to extend the rebuttal disclosure date.

To date, parties have served multiple sets of written discovery and disclosures. The parties have also responded to written discovery. Defendant Pedro Valladares Hidalgo was deposed on November 28, 2022. The depositions of Plaintiff Anthony Washington and LVMPD Officer Jeffrey Bengel were taken on December 15, 2022 and November 2, 2022, respectively. The

depositions of Mark B. Kabins, M.D. and Sudhir Khemka, M.D. have been scheduled for July 29, 2023, and July 31, 2023, respectively. An Independent Medical Examination of Plaintiff was completed on November 29, 2022. The IME Report was completed on December 28, 2022. A deposition of Dr. James Forage, who conducted said IME, is scheduled for August 10, 2023. The parties therefore stipulate to extend the rebuttal disclosure deadline, and all deadlines arising therefrom, as set forth above.

DATED this 10th day of July 2023.

SCHUETZE, McGAHA TURNER & FERRIS

By William W. McGaha

WILLIAM W. McGAHA, ESQ.
Nevada Bar #3234
601 S. Rancho Drive, Suite C-20
Las Vegas, Nevada 89106
Attorneys for Plaintiff

DATED this 10th day of July 2023.

WINNER & BOOZE

By Bruce W. Kelley

BRUCE W. KELLEY, ESQ.
Nevada Bar #7331
STEVEN D. BROKA, ESQ.
Nevada Bar #15510
1117 S. Rancho Drive
Las Vegas, Nevada 89102
Attorneys for Defendants

ORDER

IT IS SO ORDERED this 11th day of July, 2023.

[Signature]
UNITED STATES MAGISTRATE JUDGE